

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

MARY HOLMES, DENISE DAVIS,
ANDREW DALLAS, and EMPOWER
MISSOURI,

Plaintiffs,

-against-

ROBERT KNODELL, in his official capacity
as Acting Director of the Missouri Department
of Social Services,

Defendant.

Case No. 2:22-cv-04026-MDH

**JOINT MOTION FOR STAY AND
REFERRAL TO MEDIATION**

The parties hereby jointly move the Court to enter a stay of proceedings on relief for three months and refer the parties to Magistrate Judge Epps for mediation concerning relief. On June 7, 2024, following this Court's Summary Judgment Order (ECF 161), Plaintiffs filed a Report (ECF 164) "detailing the specific changes [Plaintiffs] contend are required to make Defendant's provision of SNAP benefits lawful and ADA compliant," ECF 161 at 38. Defendant responded to Plaintiffs' Report on August 22, 2024 (ECF 183). On the same day, Defendant also filed his Proposed Plan of Action (ECF 184). Based on these filings and conversations conducted between the parties prior to Defendant's August 22 filings, the parties believe it may be possible to negotiate the terms of relief in this litigation.

In order to allow the parties to engage in efficient and productive negotiations, the parties respectfully request that this Court:

1. Issue a three month stay of proceedings on relief;
2. Refer the parties to Magistrate Judge Epps for mediation on relief;

3. Defendant agrees to continue to file the data reports required by the Summary Judgment Order during the stay;
4. That the parties enter a joint status report to this court at the conclusion of the three month stay;
5. In the event that negotiations fail, allow Plaintiffs at least two weeks before any hearing or decision concerning relief to reply to ECF 183 and respond to ECF 184 following the conclusion of the stay; and
6. Postpone the hearing currently scheduled for September 4, 2024 until the conclusion of the three month stay.

Dated: August 29, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was forwarded to all attorneys of record via the Court's electronic filing system on August 29, 2024.

By: /s/ Katharine Deabler-Meadows
Attorney for Plaintiffs